

REMARKS

Prior to entry of this amendment, Claims 1-10 were pending in this application. Claims 11-30 are added and no claims are canceled. Hence, Claims 1-30 are presently pending in this application.

ISSUES RELATING TO PRIOR ART

Ferrel in view of Beattie—35 U.S.C. §103(a)

The Office Action rejected Claims 1-10 under 35 U.S.C. §103(a) as allegedly unpatentable over Ferrel et al. (“*Ferrel*”; U.S. Patent No. 5,907,837) in view of Beattie et al. (“*Beattie*”; U.S. Patent No. 6,256,627). The rejection is traversed.

In Claim 1, the **concept and information type are used to search a cache of information objects**, yielding a result set. Significantly, the requested document is not cached. Rather, individual information objects that are used to create the document are cached, avoiding a substantial performance bottleneck (see page 63, lines 18-21). An example of a concept might be “Cisco 7500 Router”; an example of an information object might be “Release Notes.” From the result set, **matching information objects are retrieved based on following index pointers in the result set**. Thus, the result set acts as an index into a repository of information objects, for fast and efficient retrieval of the information objects from which the requested electronic document is automatically created.

The Office Action does not establish a *prima facie* case of obviousness because the Office Action does not address the use of a “concept” and an “information type” with respect to any of the claim features that recite those terms.

First, the Office Action does not show that *Ferrel* describes (1) a query that contains **a concept and an information type** as recited in Claim 1; and (2) a cache search based on the concept and information type. Applicants are not trying to claim search of a cache for information objects organized in a hierarchical tree, *per se*. Therefore, reliance on *Ferrel* to support an obviousness rejection, with no weight given to the use of a concept and an information type as recited in Claim 1, is unfounded. Moreover, *Ferrel* is missing these features of the claim.

Next, the Office Action does not address the use of index pointers in rows of a result set, to retrieve information objects that match with the concept and information type. The use of the concept and information type is again ignored by the Office Action in relying on *Beattie* for the alleged teaching of several features recited in Claim 1. *Beattie* does not describe any uses of concept and information type.

Furthermore, the query log of *Beattie* does not contain any pointers, such as pointers to information objects as recited in Claim 1. Rather, the query log of *Beattie* that is relied upon for an alleged teaching of (1) identifying rows that match the concept and information type; (2) yielding a result set; and (3) retrieving information based on following index pointers in the result set, contains a column for “search query”, “matching documents”, “accessed documents”, “source indicator”, and statistics regarding the matching and accessed documents (Fig. 4B). Hence, *Beattie* does not describe any pointers in the query log and, therefore, *Beattie* does not support a valid obviousness rejection.

The Office Action presents an alleged **motivation to combine** *Ferrel* and *Beattie* to provide “the benefit of having rows for better organization on the information and

results for the user.” This alleged motivation apparently focuses on a motivation to combine the query log of *Beattie* with the retrieval system of *Ferrel*. However, a combination of *Ferrel* and *Beattie* does not produce the features recited in Claim 1, as shown above. Further, the alleged motivation has nothing to do with the subject matter of Claim 1 and does not meet the standard required for a *prima facie* obviousness rejection.

For example, the result set of rows recited in Claim 1 is not provided to the user, but serves as an intermediate mechanism for getting to information objects for automatic creation of an electronic document that is delivered to a user. Thus, even if one skilled in the art were motivated to combine the references for the reason stated in the Office Action, that reason would not motivate someone to combine the references to develop the method that is recited in Claim 1.

For at least the foregoing reasons, *Ferrel* and *Beattie* do not make Claim 1 obvious to one skilled in the art. Reconsideration is respectfully requested.

Claims 2-7 depend directly or indirectly from Claim 1 and, therefore, are patentable over the references of record for at least the same reasons as Claim 1. Therefore, reconsideration of Claims 2-7 is requested.

In addition, each of Claims 2-7 recites one or more additional features that are not taught, suggested or motivated by *Ferrel* and *Beattie*. However, because of the fundamental deficiencies in the disclosures of the cited references, described above, further argument regarding these additional patentable features is deferred.

Claim 8 recites computer-readable media carrying sequences of instructions which, when executed by one or more processors, cause the processors to perform steps

that correspond to steps recited in Claim 1. Claim 9 recites an apparatus comprising means for performing steps recited in Claim 1. Claim 10 recites a computer system comprising processors configured for performing the steps recited in Claim 1. Therefore, Claims 8-10 are patentable over the references of record for at least the same reasons as Claim 1. That is, it is shown above in reference to Claim 1 that *Ferrel* and *Beattie* do not teach, suggest or motivate **automatic electronic document generation based on (1) a requested concept that specifies a term from an enterprise-specific vocabulary and (2) a requested information type that specifies a type of information about the concept**. These deficiencies in the disclosures of *Ferrel* and *Beattie* disprove the allegation that these references make Claims 8-10 obvious to one skilled in the art. Reconsideration of Claims 8-10 is requested.

ISSUES NOT RELATING TO PRIOR ART

Amended Claims 1 and 8-10

Claim 1 recites a method for **dynamically generating an electronic document based on enterprise-specific vocabulary** (page 6, lines 14-17), in which a request is received, which contains a concept and an information type. The **concept specifies a term from the enterprise-specific vocabulary**, and the **information type specifies the type of information, in association with the concept, requested in the request**. For example, the concept may name a particular product produced by the enterprise and the information type may specify “Introduction” or “Data Sheet Table,” which specify the type of information, from respective information objects, that the requestor wants in the electronic document.

Claims 1 and 8-10 are amended herein to make the embodiments recited in such claims easier to understand, rather than for reasons related to patentability. Furthermore, the claim amendments are tangential to any equivalents of the amended features. Thus, while the amendments are not required to overcome prior art, further describing the terms “concept” and “information type” in the claims provides a clearer claim construction.

New Claims 11-30

Claims 11-30 are added to claim additional embodiments described in the application. No new matter is introduced.

Claims 11-30 depend from one of independent Claims 1 and 8-10. Therefore, Claims 11-30 are patentable over the references of record for at least the same reasons as the independent claims from which these claims depend, as described above. Further, each of Claims 11-30 recites additional features that are not taught, motivated, or suggested in the cited references of record. Consideration and allowance of these claims are kindly requested.

CONCLUSION

For at least the reasons indicated above, all of the pending claims (1-30) present patentable subject matter over the references of record, and are in condition for allowance. Therefore, Applicants respectfully request issuance of a timely Notice of Allowance in this case. If the Examiner has questions regarding this case, the Examiner is invited to contact Applicant's undersigned representative.

To the extent necessary, a petition for an extension of time under 37 C.F.R.
§1.136 is hereby made. Please charge any shortages in fees due in connection with the
filing of this paper, including extension of time fees, or credit any overages to Deposit
Account No. 50-1302.

Respectfully Submitted,

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